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UNITED STATES OF AMERICA
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13 UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

14 IN THE MATTER OF THE SEIZURE OF:

CV No. 18-06742-RGK (PJWx)

15 ANY AND ALL FUNDS HELD IN
16 REPUBLIC BANK OF ARIZONA ACCOUNTS
XXXX1889, XXXX2592, XXXX1938,
17 XXXX2912, AND XXXX2500.

**GOVERNMENT'S EX PARTE APPLICATION
FOR EXTENSION OF TIME TO FILE
RESPONSE TO CLAIMANT LACEY'S
SUPPLEMENTAL BRIEFING FOR DOC. 22
(DOC. 105) AND MOVANT LARKIN'S
LEGAL AUTHORITY FOR OPPOSITION TO
SEIZURE WARRANTS AND BASIS FOR
RELIEF (DOC. 106)**

20 Current deadline: 10/18/2019
21 Requested deadline: 10/28/2019
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23 On August 1, 2018, Movant James Larkin ("Movant Larkin"), by and
24 through his counsel, filed a Motion to Vacate or Modify Seizure
25 Warrants (Dkt. No. 6). On August 10, 2018, Claimant Michael Lacey
26 ("Claimant Lacey"), by and through his counsel, filed a Motion for
27 Release of Certain Untainted Funds (Dkt. No. 22). On September 14,
28 2018, the government filed their opposition (Dkt. No. 53).

1 On October 4, 2019, the Court ordered Movant Larkin and Claimant
2 Lacey to provide additional briefing explaining the legal authority
3 and standards for their respective motions, to be filed on or by
4 October 11, 2019. Additionally, the Court ordered that any
5 subsequent response from the government to be filed no later than
6 October 18, 2019.

7 On October 11, 2019, Claimant Lacey and Movant Larkin filed
8 their supplemental briefing (Dkt. Nos. 105 and 106, respectively).

9 Now, by this unopposed, *ex parte* application, the government
10 requests that this Court extend by ten days the government's deadline
11 to respond, from October 18, 2019, to October 28, 2019. The
12 government is now making this request due to the need for additional
13 time to confer with government co-counsel in the District of Arizona
14 regarding issues that could affect the related criminal proceeding in
15 that District. Additionally, certain government counsel assigned to
16 this matter are and have been unavailable due to pre-planned travel,
17 and one member of the prosecution is absent to attend a funeral.

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1 On October 15, 2019, the government contacted defense counsel,
2 and on October 17, 2019, defense counsel indicated that they take no
3 position on this request.

4 Dated: October 18, 2019

Respectfully submitted,

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11 /s/John J. Kucera

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